

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MELVIN BAISDEN,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 06-304 GMS)
)	
SHERIDAN NISSAN,)	
)	
)	
Defendant.)	

PLAINTIFF'S RULE 26(a)(1) INITIAL DISCLOSURES

Plaintiff, Melvin Baisden, hereby submits the following Initial Disclosures, pursuant to Fed. R. Civ. P. 26(a)(1).

(A) The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment identifying the subjects of the information.

ANSWER:

1. Melvin Baisden: 4172 Mistymorn Way, Powder Springs Georgia 30127, (770) 485-7388.
2. Stacey Baisden: 4172 Mistymorn Way, Powder Springs Georgia 30127, (770) 485-7388
3. Dan Hall: Address and telephone number unknown at present.
4. Chris Blaylock: Address and telephone number unknown at present.
5. Allan McCormick: Address and telephone number unknown at present.
6. George Yang: Address and telephone number unknown at present.
7. Phil Richardson: Address and telephone number unknown at present.
8. Justin Bellinzoni: Address and telephone number unknown at present.
9. Juanita Summers: Address and telephone number unknown at present.

(B) A copy of, or a description by category and location of, all documents, data compilations, and tangible things in the possession, custody, or control of the party that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

ANSWER:

1. Various documents from Plaintiff's Delaware Department of Labor administrative case file.
2. Various documents from Plaintiff's employee personnel file. Upon information and belief, this information is in Defendant's possession.
3. A Delaware State Police report regarding Mr. Baisden's complaint against Justin Bellinzoni.
4. A Buyer's Order for the sale of a vehicle to Juanita Summers.
5. Sheridan Nissan's company policy regarding Weapons/Disruptive or Violent Behavior.
6. Plaintiff reserves the right to name additional documents at a later time and/or during the discovery process. Plaintiff further reserves the right to utilize any and all of Defendant's documents.

(C) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

ANSWER:

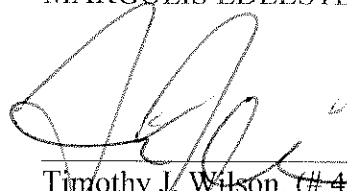
This information has yet to be ascertained. It will be provided at a later date.

(D) For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

ANSWER:

Not applicable.

MARGOLIS EDELSTEIN

A handwritten signature in black ink, appearing to read 'T. Wilson', is written over a horizontal line.

Timothy J. Wilson, (# 4323)
1509 Gilpin Avenue
Wilmington, DE 19806
(302) 777-4680
(302) 777-4682 fax
Attorney for Plaintiff

Dated: March 1, 2007

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MELVIN BAISDEN,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 06-304 GMS)
)	
SHERIDAN NISSAN,)	
)	
)	
Defendant.)	

CERTIFICATE OF SERVICE

I, Timothy J. Wilson, do hereby certify that on March 1, 2007, I electronically filed the *Plaintiff's Rule 26(a) Initial Disclosures* with the Clerk of the Court using CM/ECF which will send notification of such filing, and have also sent one (1) true and correct copy by First Class U.S. Mail, postage prepaid to the following:

Megan Mantzavinos, Esquire
Marks, O'Neill, O'Brien & Courtney, P.C.
913 North Market Street
Suite 800
Wilmington, DE 19801

and

Elizabeth F. Walker, Esquire
Campbell, Walker & Stokes
1818 Market Street, Suite 2510
Philadelphia, PA 19103

MARGOLIS EDELSTEIN



Timothy J. Wilson, (# 4323)
1509 Gilpin Avenue
Wilmington, DE 19806
(302) 777-4680
(303) 777-4682 fax
Attorney for Plaintiff

Dated: March 1, 2007